

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Abad, Jennifer	NY	USA	Abad, Edelmiro	Child	N/A
2	Abad, Lorraine	NY	USA	Abad, Edelmiro	Spouse	N/A
3	Abad, Serena	NY	USA	Abad, Edelmiro	Child	N/A
4	Adderley, Terrence	MI	USA	Adderley, Jr., Terence	Parent	N/A
5	Barkow, Crystal	PA	USA	Barkow, Colleen	Stepchild	N/A
6	Barkow, Daniel F.	PA	USA	Barkow, Colleen	Spouse	N/A
7	Barkow, Kayla	PA	USA	Barkow, Colleen	Stepchild	N/A
8	Brennan, Edward	NJ	USA	Brennan III, Edward A.	Parent	N/A
9	Brennan, Gail	NJ	USA	Brennan III, Edward A.	Parent	N/A
10	Burnside Sturiano, Sandra	NY	USA	Burnside, John P.	Spouse	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
11	D'Alessandro, Mariano	NY	USA	Gargano, Rocco N.	Nephew	N/A
12	DeNiro Graffino, Anthony D.	NY	USA	Carroll, Peter J.	Stepchild	N/A
13	Devitt, Sr., Robert	NJ	USA	Devitt, Jr., Robert	Parent	N/A
14	Fried, Kenneth	NY	USA	Fried, Arlene E.	Spouse	N/A
15	King, Elizabeth A.	FL	USA	King, Robert	Child	N/A
16	King, Stephen J.	FL	USA	King, Robert	Child	N/A
17	King, Theresa	FL	USA	King, Robert	Spouse	N/A
18	King, Thomas C.	FL	USA	King, Robert	Child	N/A
19	Lenoir, Andrew R.	NY	USA	Lenoir, John Robinson	Child	N/A
20	Lenoir, Courtney A.	NY	USA	Lenoir, John Robinson	Child	N/A
21	Richards Frankel, Asher	NY	USA	Richards, Gregory D.	Child	N/A
22	Richards Frankel, Erin P.	NY	USA	Richards, Gregory D.	Spouse	N/A
23	Ruggiere Donovan, Claudia	NY	USA	Ruggiere, Bart	Spouse	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
24	Vilardo, Matthew	NJ	USA	Vilardo, Joseph	Child	N/A
25	Vilardo, Patricia	NJ	USA	Vilardo, Joseph	Spouse	N/A

Dated: December 03, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler
James P. Kreindler, Esq.
Andrew J. Maloney III, Esq.
750 Third Avenue, 32nd Floor
New York, New York 10017
Tel: (212) 687-8181
COUNSEL FOR PLAINTIFFS